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June 27, 2025

**VIA ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
for the Southern District of New York.  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2203  
New York, New York 10007

Re: *Atlantic Casualty Ins. Co. v. Bayport Construction et. al.*  
S.D.N.Y.; Civil Action No.: 25-cv-1163(RA)  
Our File No.: 098-11772

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Dear Judge Abrams:

I represent plaintiff Atlantic Casualty Insurance Company (“Atlantic Casualty”) in the above-captioned action. Pursuant to Paragraph 1.D. of Your Honor’s Individual Rules & Practices in Civil Cases, I, with the consent of counsel for the defendants, seek to adjourn the initial teleconference scheduled for July 11, 2025 to a date that is convenient for the Court.

I request this extension because I have a prior volunteer commitment on July 11<sup>th</sup>. I am helping to organize a community wide tag sale in the town in which I live to support our local library. I participate in this volunteer activity every year.

The Honorable Ronnie Abrams, USDJ

Page 2

The initial conference was originally scheduled on April 11, 2025 but was adjourned to May 30, 2025 because counsel for Bayport Construction Corporation (“Bayport”) requested time to respond to Atlantic Casualty’s complaint. On May 1, 2025, Atlantic Casualty filed a letter motion seeking an extension of time: (i) to file its opposition to Bayport’s motion to dismiss the complaint until May 23, 2025; (ii) for the parties to file their joint letter, case management plan and scheduling order by June 13, 2025; and (iii) for the initial conference that is convenient for the Court. On May 2, 2025, Your Honor granted this application. *See* ECF Doc. 23. On May 28, 2025, Your Honor set the initial conference for May 30, 2025. *See* ECF Doc. 26. On May 29, 2025, the Court amended its prior order and set the initial conference for July 11, 2015.

Atlantic Casualty’s request for an extension will not alter the fact that the parties will still submit its case management materials and joint letter to the Court by July 3, 2025

Thank you for your attention to this matter.

Respectfully submitted,

*Maria T. Ehrlich*

Maria T. Ehrlich

Application granted. The initial teleconference is rescheduled for July 10, 2025 at 4:00 p.m.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', followed by a horizontal line.

Hon. Ronnie Abrams

June 30, 2025